

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No.: 19-14866
Chong Woo Yi	:	
	:	
	:	
Debtor	:	Chapter 13

RESPONSE OF CHONG WOO YI TO THE STANDING TRUSTEE'S MOTION TO
CONVERT CASE TO CHAPTER 7

1. Admitted.
2. Denied. The Debtor attempted to make his payment in a timely manner but had difficulty using the Trustee's TFS system. Per the Debtor, he made his first payment in the sum of \$1,000.00 on January 28, 2020 through the TFS system. Further, the Debtor intends on making his February 1, 2020 payment by way of the TFS system by or before January 31, 2020.

Moreover, the Order allowing the conversion of the instant case from a Chapter 7 was signed on or about December 4, 2019 and the Chapter 13 Plan was filed on December 12, 2019 and listed the first payment due in January, 2020. Accordingly, the Debtor is not five (5) months delinquent on his Chapter 13 payments.

3. It is admitted that non-exempt equity does exist in the real estate owned by the Debtor.
4. Denied. The Debtor is or will be caught up expeditiously with trustee payments and the creditors will be satisfied in accordance with the December 4, 2019 Order while the Debtor maintains his ownership interest in the subject real property.

/s/Brad J. Sadek, Esquire

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